

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN,

Plaintiff,

v.

OMNIS GLOBAL TECHNOLOGIES, LLC;  
OMNIS BUILDING TECHNOLOGIES, LLC;  
OBT BLUEFIELD, LLC; OMNIS FUEL  
TECHNOLOGIES LLC D/B/A OMNIGEN;  
AND OMNIS SUBLIMATION RECOVERY  
TECHNOLOGIES, LLC,

Defendants.

Civil Action No. 2:24-cv-01319

**DECLARATION OF MATHEW HART**

I, Mathew Hart, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct based on personal knowledge:

1. I am currently employed by Omnis Building Technologies, LLC as Vice President of Human Resources.

2. I live and work in Morgantown, West Virginia.

3. Omnis Global Technologies, LLC employed Michelle Christian from November 16, 2020, until she was furloughed on July 21, 2021. Ms. Christian was reinstated with Omnis Global Technologies, LLC, on July 29, 2021. In April 2022, Ms. Christian became an employee of OBT Bluefield, LLC.

4. Omnis Global Technologies, LLC, Omnis Building Technologies, LLC, OBT Bluefield, LLC, Omnis Fuel Technologies LLC D/B/A Omnigen, and Omnis Sublimation Recovery Technologies, LLC are all headquartered in Morgantown, West Virginia.

5. All employment records relating to Ms. Christian were kept Morgantown, West Virginia.

6. Ms. Christian's job required her to work in many states, including West Virginia.

7. Although Omnis Global Technologies, LLC, Omnis Building Technologies, LLC, OBT Bluefield, LLC, Omnis Fuel Technologies LLC D/B/A Omnigen, and Omnis Sublimation Recovery Technologies, LLC employ individuals working on-site and remotely at various locations in the United States, their operational, executive, administrative, and policymaking decisions primarily occur in Morgantown, West Virginia.

8. Many of the witnesses who would likely be called to testify in this matter, based on the allegations in Plaintiff's Complaint, include executive-level employees who reside in or near Morgantown, West Virginia and work for the Defendants in Morgantown, West Virginia.

9. Simon Hodson and Jonathan Hodson live and work in the Northern District of West Virginia,

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 5/24/24

A handwritten signature in blue ink, appearing to read "Matthew J. Hodson", is written over a horizontal line.